

ECF CASE  
JUDGE SCHEINDLIN

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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**J & J SPORTS PRODUCTIONS, INC.,** as  
Broadcast Licensee of the **May 5, 2007**  
**DeLaHoya/Mayweather** Program,

Plaintiff,

-against-

NELLY OLMEDO BUCHELI, Individually,  
and as officer, director, shareholder and/or  
principal of OLMEDO OLMEDO INC. d/b/a  
MOJITAS BAR & GRILL a/k/a MOJITAS  
LOUNGE RESTAURANT a/k/a MOJITAS,

and

OLMEDO OLMEDO INC. d/b/a MOJITAS  
BAR & GRILL a/k/a MOJITAS LOUNGE  
RESTAURANT a/k/a MOJITAS,

Defendants.  
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**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**  
Civil Action No. 07-CV-08419  
HON. SHIRA A. SCHEINDLIN

**PLEASE TAKE NOTICE** that upon the affirmation of Julie Cohen Lonstein, sworn to  
on the 2<sup>nd</sup> day of April 2008, in support of said application and the exhibits attached thereto,  
Plaintiff moves this Court for an order granting the entry of default judgment against the  
Defendants jointly and severally as follows:

**Against, NELLY OLMEDO BUCHELI, Individually, and as officer, director, shareholder  
and/or principal of OLMEDO OLMEDO INC. d/b/a MOJITAS BAR & GRILL a/k/a  
MOJITAS LOUNGE RESTAURANT a/k/a MOJITAS, and OLMEDO OLMEDO INC.  
d/b/a MOJITAS BAR & GRILL a/k/a MOJITAS LOUNGE RESTAURANT a/k/a  
MOJITAS,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN  
THOUSAND DOLLARS (\$10,000.00)

- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of EIGHT HUNDRED TWENTY FOUR DOLLARS AND FIFTY CENTS (\$824.50)

**Against, OLMEDO OLMEDO INC. d/b/a MOJITAS BAR & GRILL a/k/a MOJITAS LOUNGE RESTAURANT a/k/a MOJITAS,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of EIGHT HUNDRED TWENTY FOUR DOLLARS AND FIFTY CENTS (\$824.50)

Dated: April 2, 2008  
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein  
Julie Cohen Lonstein  
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